

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

BROADCAST MUSIC, INC; PEER  
INTERNATIONAL CORPORATION; CD  
ELVIS PUBLISHING; SER-CA  
PUBLISHING, INC.; LUAR MUSIC  
CORP., d/b/a Luar Music Publishing;  
SONGS OF UNIVISION, INC.;  
FONOMUSIC, INC.; d/b/a Fonohits Music  
Publishing, Inc.; UNIVERSAL-SONGS OF  
POLYGRAM INTERNATIONAL, INC.;  
EMOTIONAL WRENCH; and DOOR  
NUMBER ONE MUSIC,  
Plaintiffs

VS.

TEX BORDER MANAGEMENT, INC.,  
d/b/a Far West, and ALFREDO  
HINOJOSA, Individually  
Defendant

CIVIL ACTION NO. 3:10-CV-02524

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION  
FOR SUMMARY JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, TEX BORDER MANAGEMENT, INC., d/b/a Far West, and ALFREDO HINOJOSA, Individually, Defendants herein, and files this Response to Plaintiff's Motion for Summary Judgment.

A brief that sets forth the argument and authorities on which Defendants rely in support of this response is filed separately pursuant to Local Rule 56.5. Each of the matters required by Local Rule 56.3(a) are set forth in the brief.

WHEREFORE, PREMISES CONSIDERED, Defendants request the Court to deny Plaintiff's Motion For Summary Judgment, and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, in accordance with the Federal Rules of Civil Procedure, a true and correct copy of the foregoing documents was served via the Court's ECF Filing System, Facsimile and/or US Mail, first class, postage prepaid, on the 1st day of May, 2012, on the following counsel of record:

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